

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
HEIDI A. OJEDA
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Heidi_Ojeda@fd.org

6 Attorney for Michael Pebley

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MICHAEL PEBLEY,

14 Defendant.

Case No. 2:16-mj-301-NJK

STIPULATION TO MODIFY
CONDITIONS OF RELEASE

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Alexandra Michael, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi A. Ojeda,
19 Assistant Federal Public Defender, counsel for Michael Pebley, to modify the condition of release.

20 This Stipulation is entered into for the following reasons:

21 1. On May 16, 2016, the Court ordered Mr. Pebley released under Pretrial Services
22 supervision with special conditions. PR Bond # 10. One of those conditions was for Mr. Pebley
23 to resolve any outstanding warrants within 60 days. At the time of his arrest, Mr. Pebley had a
24 warrant from Boulder City. Since his release, he was able to quash the warrant. The Boulder City
25 court set up a payment plan of \$100 a month to satisfy the warrant.

26 2. Currently, pursuant to the conditions of his release, Mr. Pebley is at the halfway
27 house on lock-down with GPS monitoring. As part of his release, the Court did not allow him to

1 seek and maintain employment. Without that employment, Mr. Pebley is unable to pay the \$100
2 a month for his Boulder City warrant. He was told that failure to pay would result in a warrant
3 becoming active again.

4 3. Since Mr. Pebley's release, he has been completely compliant with all the
5 conditions of his release. His Pretrial Services officers, Kamuela Kapanui, indicated that he has
6 interacted with Mr. Pebley on several occasions, and he has always been respectful and had a good
7 attitude. Further, Pretrial Services is currently working to get Mr. Pebley evaluated for mental
8 health and substance abuse treatment.

9 4. Given Mr. Pebley's compliance, positive attitude and that he needs the finances to
10 stay in good standing with the Boulder City court, Mr. Pebley request that this Court modify his
11 conditions of release to allow him to maintain or actively seek lawful and verifiable employment
12 that is approved by Pretrial Services.

13 5. Neither the Government nor Pretrial Services oppose this requested modification.

14 DATED this 16th day of June, 2016.

15
16 RENE L. VALLADARES
Federal Public Defender

17 /s/ Heidi A. Ojeda

18 By _____

19 HEIDI A. OJEDA
Assistant Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

17 /s/ Alexandra Michael

18 By _____

19 ALEXANDRA MICHAEL
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,
5 v.
6 MICHAEL PEBLEY,
7 Defendant.
8

Case No. 2:16-mj-301-NJK

ORDER

9
10 IT IS THEREFORE ORDERED, that Mr. Pebley's pretrial release
11 conditions be modified to allow him to maintain or actively seek lawful and verifiable employment
12 that is approved by Pretrial Services.

13 DATED this 16 day of June, 2016.
14

15
16 
17 UNITED STATES MAGISTRATE JUDGE
18
19
20
21
22
23
24
25
26
27